ASH GROVE CEMENT COMPANY

Semi Annual NSPS Report
Opacity COMS Summary Report for 40 CFR 60.7(d)
January-June 2007

Reporting period dates: January 1, 2007– June 30, 2007
Company: Ash Grove Cement Company, 3801 E. Marginal Way So. Seattle, WA 98134
Process unit(s) description:
The in-line kiln/raw mill system includes an ID fan, the main baghouse dust collector, the Raw Mill, preheater/precalciner, and rotary kiln. The system converts dry raw materials prepared in the raw mill into cement clinker by heating it to the point of incipient infusion in the preheater/ precalciner and kiln. New chemical compounds are formed in the clinkering process that produces the hydraulic properties of portland cement. The system is heated by fossil fuels that are combusted at the lower or clinker discharge end of the inclined rotary kiln and in the precalciner and tire derived fuel introduced to the system at in the precalciner. The flow of combustion products is countercurrent to the flow of raw materials down the kiln.

Emission limits: 20% @ 6 minute average
Monitor manufacturer and model no: Teledyne LightHawk 560
Date of latest COMS Certification or Audit: 05/24/2007
Total source-operating time in reporting period: 3588 hrs

Include with the Emission Data Summary[1]:

1. **The duration of excess emissions in reporting period that was due to:**

(a) Startup/Shutdown:	0
(b) Control equipment problems:	240
(c) Process problems	0
(d) Other known causes:	0
(e) Unknown causes:	0

2. **The total duration of excess emission in minutes:** 240
3. **[Total duration of excess emissions]/[Total source operating time]*(100) =** 0.11%[2]

Include with the COMS Performance Summary[1]:

1. **The CMS downtime in reporting period due to:**

(a) Monitor equipment Malfunctions:	34500
(b) Non-Monitor equipment Malfunctions:	0
(c) Quality assurance calibration	0
(d) Other known causes:	0
(e) Unknown causes:	0

2. **The Total COMS Downtime in minutes: 34500**
3. **[Total COMS Downtime]/[Total operating time]*(100) =** 16.0%[2]

Describe any changes since last quarter in COMS, process or controls: None

Certify that the information attained in the report is true, accurate, and complete.

Gerald J. Brown, EHS Manager — 7/27/07 — Date

Name and Signature (Title) of the responsible official and Date

1. For Opacity, record all times in minutes.
2. For the reporting period: If the total duration of excess emissions is ≥ 1% or the total CMS downtime is ≥ 5% of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

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Excess Emission Report

January-June 2007

40 CFR 60.7

(1) The magnitude of excess emissions computed in accordance with § 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

(4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

OPACITY

January 2007 Process Operating Time (Minutes): 40140

No excess emissions	**Nature of the system repairs or adjustments:** On 10/25/06, the communication board for the Lear Siegler Dynatron 1100M Opacity monitor failed. A replacement board was received and installed but repeated attempts failed to maintain calibration accuracy of the equipment. The problem was traced to the communication board that turned out to be the wrong edition. When the manufacturer was contacted, we were informed that they no longer supported the monitor and could not supply the required replacement part. A new Teledyne LightHawk 560 opacity monitor was purchased and installation was complete on January 26, 2007.

February 2007 Process Operating Time (Minutes): 39180

No excess emissions or continuous monitoring system down time

March 2007 Process Operating Time (Minutes): 38880

No continuous monitoring system down time

Date	Time	6 Min Average	
3/16	15:24	36.9	Investigation indicated the cause was originating from compartment #4 of the main baghouse. The compartment was isolated and an inspection detected a broken bag. The bag was replaced and the compartment returned to service.
	15:27	71.0	
	15:30	49.7	

April 2007 Process Operating Time (Minutes): 20100

No continuous monitoring system down time

Date	Time	6 Min Average	
4/02	22:39	42.5	An investigation was begun that involved isolating suspected baghouse compartments to locate the source. In this case compartment #2 was isolated and the reverse air damper was checked. This showed both were operating normally as the opacity did not change. The compartment #2 was then put back on line. The compartment #3 was then taken off line. At this point the opacity lowered to within permitted limits. Having determined the location of the problem, an interior inspection was conducted and a broken bag found. The bag was replaced and the compartment returned to operation.
	22:42	57.8	
	22:45	62.4	
	22:48	61.7	
	22:51	58.0	
	22:54	55.9	
	22:57	45.6	
4/03	23:00	49.1	
	23:03	64.0	
	23:06	64.6	
	23:09	61.6	
	23:12	42.1	

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Excess Emission Report

January-June 2007 continued

May 2007 Process Operating Time (Minutes): 34800	
No excess emissions	**Nature of the system repairs or adjustments:** System Calibration with manufacturer representative. 5/9-07:00 hrs to 5/10-08:00 hrs: 5/24- 12:00 hrs to 15:00 hrs:

June 2007 Process Operating Time (Minutes): 41880	
No excess emissions	**Nature of the system repairs or adjustments:** System Calibration 6/19- System Calibration: 10:00 hrs to 12:00